



BAY STATE MILLING COMPANY
421 S. 99TH AVE.
TOLLESON, AZ 85353
PHONE 623-936-8400
FAX 623-936-6254

USDA-AMS
Docket Number TM-0407

Re: Hydrogen Peroxide

To Whom It May Concern:

We are a flour miller and want to use hydrogen peroxide as a water disinfectant on temper water and still maintain the certification of "100% Organic". Hydrogen peroxide would be added to the temper water and not directly to the product. The hydrogen peroxide acts a disinfectant, the same way chorine does in salad processing. The addition of moisture (tempering) occurs prior to the processing; this can be done prior to cleaning or after cleaning the grain. Since grain cleaning does not constitute processing according to the definition of processing in the Act, it would not seem to matter whether it occurs before or after cleaning. Hydrogen peroxide addition to water by definition would be prior to processing and would not represent a processing aid, but rather as a water disinfectant conditioner. Hydrogen peroxide is allowed as a disinfectant on crops without impacting the 100% organic claim.

We feel hydrogen peroxide should be allowed as a conditioner prior to processing and still maintain certification of 100% Organic. This is of high importance to us.

Regards

Randal J. Frank,

Plant Manager
Bay State Milling Company

Cc: Allison Wolff; Quality Assurance International